

Pharmacy Professional Practice Team

January 2013

PLAINTIFFS TRIAL
EXHIBIT

P-06272_00001

Corporate Purpose



We are:
A pharmacy innovation
company

Our purpose:
Helping people on their
path to better health

Our strategy:
Reinventing pharmacy

Our values:
Innovation
Collaboration
Caring
Integrity
Accountability

OPERATIONAL EXCELLENCE

Counsel ♦ Thoughtful partnerships
♦ Controlled substances ♦ Pharmacy
Standards ♦ TRAINING ♦ Workflow
♦ Promote Honesty ♦ Commitment to Self-
Improvement ♦ Awareness ♦ Quality

PROFESSIONALISM

Effective Training
Strategic Thinkers
Provide Guidance
Partner ♦ Educate
Ethical Practice

RESPONSIBILITY

Controlled Substances
Pre-empt ♦ Diversion
Improve Policy & Procedure

Promote Honesty ♦ Encourage Positive Patient Relationships ♦ Appropriate Resources ♦ Alignment ♦ Clarification ♦ Professional Competency

ACCOUNTABILITY

Focus on MY CUSTOMER

Influential and Effective Communication

COLLABORATION

Build a strong foundation

Data Scientist

Monitor ♦ Measurable
Meaningful ♦ Proactive
High Standards
Conscience ♦ Foresight

Prevent Abuse and Provide Legitimate Access I

Patient Care

LEADERSHIP

TRUST ♦ Community Needs

☆ Spark Creativity ☆

Compliance to

Federal & State

Regulations

Challenge the Status Quo

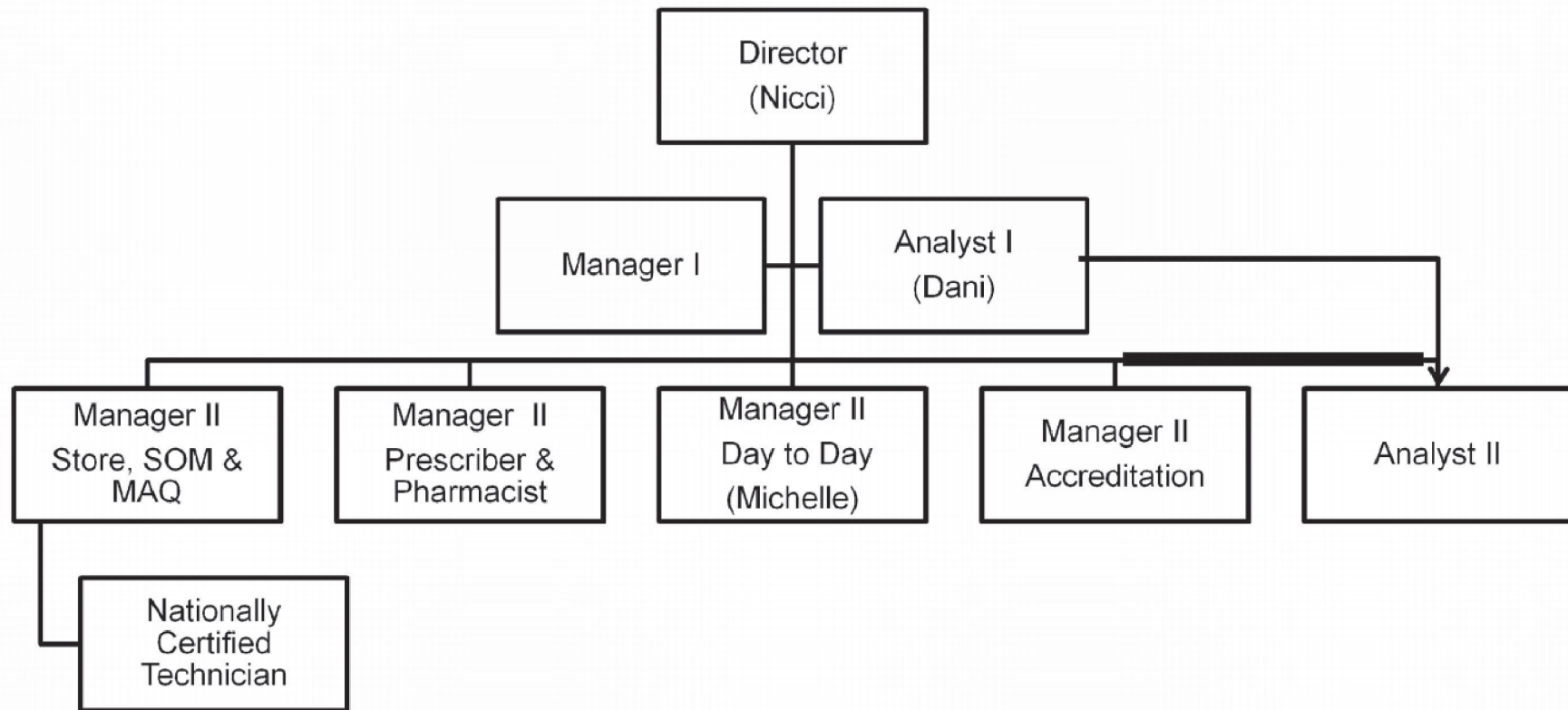
Support Our
Pharmacy
Teams

Purpose

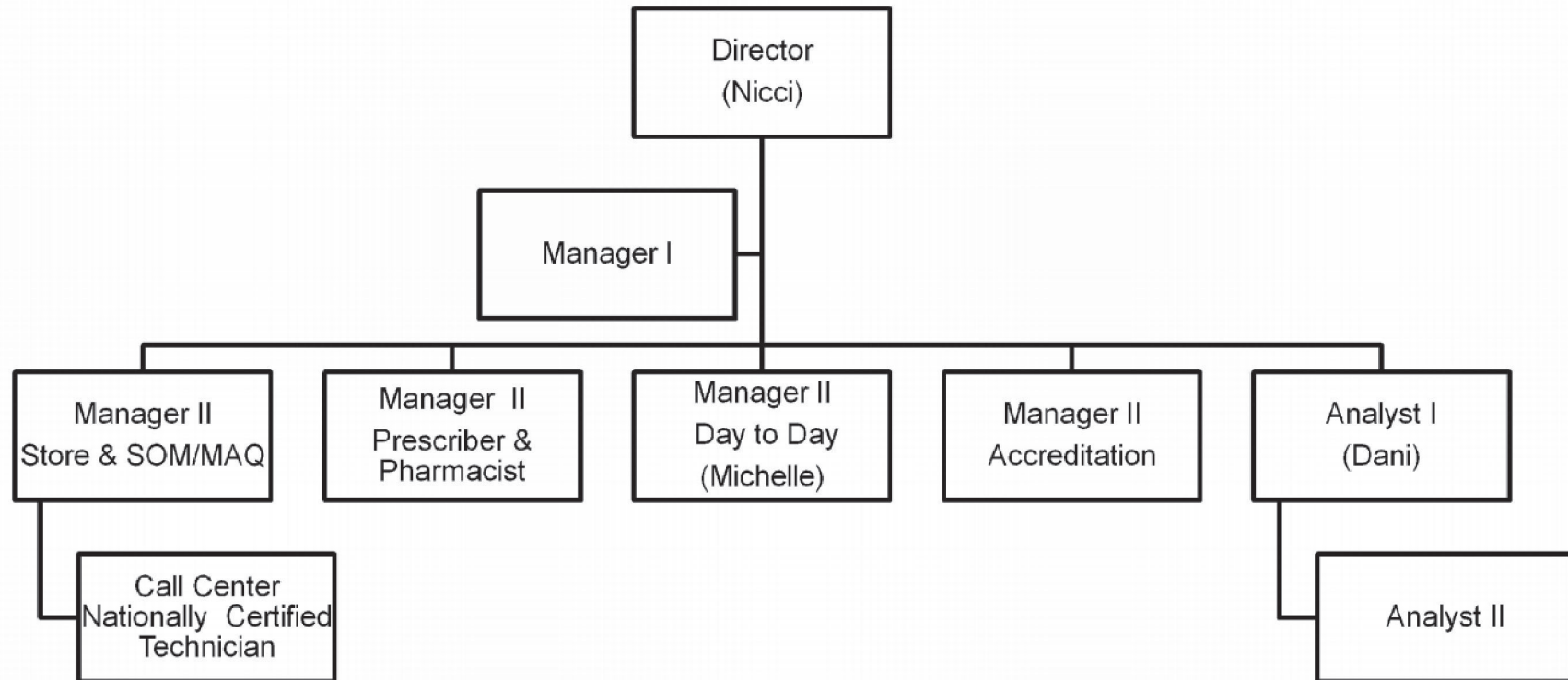
Ensure highest professional practices by proactively setting and monitoring industry leading standards, providing guidance to pharmacy teams and collaborating cross functionally to mitigate risk and improve patient outcomes.

Purpose - Detail

Recommended Pharmacy Professional Practices Organization Chart



Recommended Pharmacy Professional Practices Organization Chart



Director

Conference call with AVP/HRBP to deliver results from ARB

Close cases as appropriate

Develop plan for stores that are identified from alternate means (SOM, Field, Legal, etc.)

Evaluate Tier 2 - Magnitude 860 stores (F)

Solutions on how to operationalize plan for Tier 2 (F)

Appeal process (F)

Triage responses to OV and approval through legal

Appeals process (F)

Scalability Plan (F)

Commitees

DEA Working Committee

DEA Steering Committee

Diversion Governance Committee

Ethics Line Case Committee

PRO Committee

Legal

Consultant on cases

Manager I

- Pharmacy survey/district interviews
 - Gather data on what our store teams are saying; develop broad understanding/ hypotheses on what we want to go after next
 - Special focus on stores that have a good working relationship with local DEA officials to try and understand how DEA is thinking

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Manager II –Stores & SOM/MAQ

Manages the process for Stores in the Controlled Substance Monitoring Program

- **Pharmacist Panel Review (when required)**
- **Manage Archer**
 - Enter Tier 1 stores in Archer
 - Upload all documents in preparation for Identify Phase (received from Analyst II)
 - Write synopsis for LP use
 - Enter outcomes from ARB
 - Upload documentation from the field
- **Set Accountability Review Board and host meeting with Compliance**
- **Evaluate stores with accountability at regular intervals to evaluate progress (F)**
 - Works with Analyst II to create trending charts when required

SOM-DC

- **Create communication pathway (F)**
 - Develop strategy for utilizing information received from DC (F)

Manager II – Stores & SOM/MAQ

SOM-OV

- **Manage Call Center Employee**
 - Oversight of content and quality of calls
- **Monitor/Triage issues and escalate as needed**
- **Reporting and monitoring of trends**
- **Strategy for training and communication**
- **Accountability/ Escalation process**
- **Develop process for BO, OOS, recalls, file buys, rels**
- **Review process for handling SOM, what is the most impactful, is there a way to look at things differently**

MAQ

- **Oversight of Brad/calls and administration of the program**
- **Communications for roll out to new pilot locations**
- **Respond to field inquiries**
- **Monitor/Triage issues and escalate as needed**

Manager II – Prescriber & Pharmacist

Prescriber

- **Evaluate prescriber information for completeness and accuracy**
 - Partner to Payer Relations to ensure accuracy
- **Create full dossier on each prescriber**
 - Prescriber report
 - Google search/ BOM search/ Patient comments
- **Prescriber Panel for Tier 2**
- **Organize PARB to decide outcomes**
- **Manage prescriber contact**
 - Send out letters in proper cadence
 - Manage responses
 - Manage second letter attempt
 - Calls with prescriber to clarify additional information
 - Letter sent with decision to suspend or no suspension
- **Archer Management**
 - Entry of prescribers
 - Upload and document all communication
- **Ongoing maintenance for Prescribers Messaging**
 - Partner with Payer Relations to suspend prescribers
 - Maintain updated communication and suspended prescriber list with Helpdesk
 - Store/Field communications/ training

Manager II - Prescriber & Pharmacist

Pharmacist

- **Generate information on professional practice for pharmacist to assist sups in coaching teams**
- **How to get focus on concept not as a metric- commendable – satisfactory – unsatisfactory (F)**

Manager – Day to Day

PMP

- Task communication
- Companywide state specific field testing for compatibility to CVS intranet
- Troubleshooting issues at the state and IS level
- Store training

Compliance

- **Rx Regulatory Audit launch**
 - Tool design and testing
 - Compliance partner
 - Pilot design and launch
 - Field Pilot follow up
 - Audit refinement
 - RxSupervisor training
 - SOS integration
- **Schedule Change of Hydrocodone in NY to CII**
 - System enhancement solutions
 - One shot requirement development
 - Training for NY and Neighboring states affected
 - MD Panel through Mark Kolligan's group

Manager – Day to Day

Day to Day Practices

- **Prescription Validation**
 - Weekly reporting on completion
 - Coordinating monthly update and release
 - Data pull from Data Warehouse
 - Data to Toluna
 - Requesting monthly link change to Toluna
 - Store task release
 - Store communication
 - Continuous quality improvement
 - Tool enhancements
 - Integration of monthly results into Stores Own Sales performance review
 - Creation of 3rd party validation review
 - Additional /removal of features
 - Alignment to Stores Own Sales
 - Issue resolution
 - Internal Audit resource for audit process clarifications

Manager – Day to Day

- **Professional Practice Overall SOS maintenance**
 - Inclusive of Employee Diversion, Corresponding Responsibility, Rx Validation, Professional Practice Standards Topic Quarterly Review
- **Policies**
 - Early Refill of Controls Early Refill of Controls
 - Written policy
 - System enhancement BSR development and Build
 - Partial Fill
 - Physicians Prescribing Controls for Self or Family
 - PIC/POA process
- **Miscellaneous requests for information/ communications based on Operational knowledge**
 - DEA Schedule Conflict
 - BOH Modification Report

Quality and Patient Safety

Quarterly Quality Review

- Build and design to initiate in early January for a March release
- Partner with Quality team to integrate into Professional Practices quarterly review
- SOS integration

Manager- Day to Day

IS Work

- **Enhanced Controlled Substance Inventory**
 - RF unit Controlled Substance Inventory Partition
 - Requirements
 - Build
 - Testing
 - Develop program parameters for quarterly push of inventory to stores
 - Test Cycle Count task feasibility
 - Partner with LP to build program
- **Controlled Substance Management Track**
- **PMP Aug 2013**

Manager II – Accreditation & RAC Audits

Analyst I

Store algorithm output

- Trending analysis
- Current State analysis – develop refreshed group of stores to review
- Tier 1 view for four drugs
- Trending and impact for previously identified stores
- Implementation of reporting/algorithms in-house – Work with IS partners and external consultants to internalize algorithm, reporting and thresholding work that is currently being conducted by outside vendor
 - Work with IS and external consultants to define scope of project
 - Write requirements and test cases
 - Manage stakeholders
 - Conduct testing and defect resolution
- **Analysis to understand broader impact of controlled substance monitoring initiatives on the retail pharmacy**
 - Look at impact on pharmacy metrics for stores that have had action (DEA or in house) taken against them for various metrics (script volume, margin etc) and scorecards (execution scorecard, SSS, KPM)
- **Amphetamines and stimulants:**
 - Conduct ad hoc analysis to understand what this looks like in the company now
 - Secondary research to understand red flags and warning signs
 - Add categories to the store and prescriber algorithm and detailed store reports

Analyst I

- **Ad hoc analysis of DEA red flags**
 - Analysis on DEA metrics that cause concern – develop an understand for profiles of red flags and what our stores that fall under them look like (cash differential etc)
- **Walgreens impact analysis**
 - Trending for stores impacted by shut down of distribution center
 - Share shift post shut down

Prescriber algorithm output

- Look at top prescribers – develop refreshed group of prescribers to review
- Review previously flagged/shut down prescribers (trending behavior)
- Work with third party to validate methodology and process

SOM enhancements:

- Design methodology for tracking/trending/reporting

Write reports, scope , plan test, implement, detailed store reports, detailed prescriber reports, algorithm, prescriber algorithm, maps, tracking and trending tool and possible MAQ.

Analyst I

Maximum Allowable Quantity Analysis

- Refresh outlier thresholds for updated time period
- Analysis to understand the correct drug groups – future trends (F)
- Addition of Maryland to the MAQ – Future States?
- Manage relationship with Cardinal per MAQ
- Account for smaller drugs and smaller stores – deep dive sensitivity analysis on the right methodology for a blanket approach to all stores (F)
- Process to analyze file buys, rels other market factors (F)
- Trending reporting for stores hitting MAQ (F)

Proactive monitoring:

- Pharmacist review
- Use an analytical as well as operational approach to understand what's trending in the controlled substance world (possible project with clinical teams)
- Macro trending of pharmacy compliance space (pill disposal, awareness, instructions)
 - Other CVS initiatives to gain equity within the space (pilot track and trade

Analyst II

- Stores**

- Run store algorithm quarterly
- Generate store reports
- Ad hoc store reports (legal, compliance, etc)

- Prescriber**

- Run prescriber algorithm quarterly
- Generate prescriber reports
- Adhoc reports (legal)

- MAQ**

- One off requests from Cardinal etc to understand store behavior